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August 24, 2016

Via Electronic Filing

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
P. O. Drawer 11649
Columbia, SC 29211

**Re: Petition of the SCTC to Require Interconnected Voice Over Internet
Protocol Service Providers to Contribute to the South Carolina
Universal Service Fund
Docket No. 2016-267-C**

Dear Ms. Boyd:

Enclosed for filing is AT&T South Carolina's Petition to Intervene in the above-referenced docket.

As indicated on the attached Certificate of Service, all parties of record are being served with a copy of this Petition.

Sincerely,

Patrick W. Turner

PWT/mhs
Enclosure

cc: Office of Regulatory Staff
All Parties of Record

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**BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

IN RE: Petition of the SCTC to Require)	
Interconnected Voice Over Internet`)	DOCKET NO. 2016-267-C
Protocol Service Providers to Contribute)	
To The South Carolina Universal Service Fund)	

AT&T'S PETITION TO INTERVENE

Pursuant to S. C. Code Regs. 103-825, AT&T South Carolina¹ respectfully requests that the Public Service Commission of South Carolina (“the Commission”) allow it to intervene in this proceeding with full rights to participate as a party of record to represent its interests. In support of this request, AT&T South Carolina respectfully submits that:

1. AT&T South Carolina is a telephone utility that provides, among other things, local exchange telecommunications services in various portions of South Carolina. AT&T South Carolina and/or its affiliates provide Interconnected Voice Over Internet Protocol (“VoIP”) service in South Carolina.

2. The authorized representative of AT&T South Carolina in this proceeding is:

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3. AT&T South Carolina pays into the South Carolina universal service fund (“State

¹ BellSouth Telecommunications, LLC d/b/a AT&T South Carolina.

USF”). AT&T South Carolina, therefore, has an interest in this proceeding and will be impacted by the outcome of this proceeding.

4. AT&T South Carolina generally supports the South Carolina Telephone Coalition’s (“SCTC”) Petition requesting that the Commission find that Interconnected VoIP service providers, regardless of whether they hold a Certificate of Public Convenience and Necessity, must contribute to the South Carolina State USF based on their retail voice communications services and require Interconnected VoIP service providers who are not currently contributing to the South Carolina State USF to do so on a prospective basis.

5. Without waiving the foregoing, AT&T South Carolina disagrees with SCTC’s contention that “Interconnected VoIP service is functionally equivalent to voice service provided by telecommunications service providers” for any purposes. AT&T South Carolina reserves the right to more fully present this position in the course of these proceedings as necessary and appropriate.

6. In light of the Commission-established deadline of August 24, 2016 for any interested party to file such a petition seeking intervention, AT&T South Carolina’s Petition is timely and will neither cause any undue delay nor prejudice to any party to this proceeding.

WHEREFORE, based on the foregoing, AT&T South Carolina respectfully requests the following relief:

that it be allowed to intervene as a formal party of record in this proceeding with full rights to participate as a party of record to represent its interests’

that any parties of record be directed to provide it with a copy of any pleadings, testimony and exhibits or any other filings made in this proceeding; and

that the Commission grant such further relief as it deems just and proper.

Respectfully submitted this **24th** day of August, 2016.


Patrick Turner

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CERTIFICATE OF SERVICE

Representing the South Carolina Telephone Coalition:


Marti Sawzak